

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC,

Plaintiff,

v.

ISLAND PROJECT AND OPERATING SERVICES,
LLC; VITOL US HOLDING II CO.; VITOL VIRGIN
ISLANDS CORP.; ANDREW CANNING; and OPTIS
EUROPE, LTD.,

Defendants.

CIVIL NO. 1:21-CV-00312

**VITOL DEFENDANTS' MOTION FOR ADMISSION
PRO HAC VICE OF SARAH HANNIGAN, ESQ.**

Defendants Vitol Virgin Islands Corp. and Vitol US Holding Co. (collectively, the “Vitol Defendants”), by and through undersigned counsel, hereby move this court for admission *pro hac vice* of Sarah Hannigan, Esq. in the above captioned matter. As grounds therefore:

1. Pursuant to LRCi. 7.1(f) Vitol Defendants have advised all counsel of this motion and there is no objection by any party to the admission requested.
2. Attorney Hannigan is an attorney with the law firm Susman Godfrey, LLP, 1301 Avenue of the Americas, 32nd Floor, New York, NY 10019, Telephone No.: (212) 336-8330, Email: shannigan@susmangodfrey.com. She has been admitted to practice law in New York. A copy of the *Pro Hac Vice* Application of Attorney Hannigan is attached hereto as Exhibit A.
3. Attorney Hannigan is a member in good standing of the New York bar and has not suffered any disbarment or suspension of her license to practice. The Certificate of Good Standing is attached hereto as Exhibit B.

4. The Declaration of Sarah Hannigan, Esq. in Support of Motion for Admission *Pro Hac Vice* is attached as Exhibit C.
5. The Vitol Defendants have requested that Sarah Hannigan, Esq. participate fully in the preparation and trial of this case.
6. As local counsel for the Vitol Defendants, I hereby recommend the admission *pro hac vice* of Sarah Hannigan, Esq. See Declaration attached hereto as Exhibit D.

Respectfully submitted,

Beckstedt & Kuczynski LLP

Attorneys for Vitol Defendants

2162 Church Street

Christiansted, VI 00820

Tel: (340) 719-8086 / Fax: (800) 886-6831

DATED: April 6, 2023

By: s/ Carl A. Beckstedt III
Carl A. Beckstedt III, Esq.
VI Bar No. 684
carl@beckstedtlaw.com